

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOE ANTHONY ALANIZ,  
*PLAINTIFF,*

V.

HARRIS COUNTY, TEXAS,  
SHERIFF ED GONZALEZ,  
DEPUTY VANESSA ESQUEDA,  
SGT. ANA ORTIZ, DEPUTY  
MARK CANNON  
*DEFENDANTS.*

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CIVIL ACTION NO. 4:22-cv-1991

JURY DEMANDED

**PLAINTIFF'S RESPONSE TO DEPUTY CANNON'S ADMISSIONS**

**REQUEST FOR ADMISSION NO. 1:** Admit that you did not tell Deputy Cannon you had a brain tumor on May 29, 2020.

**ANSWER:** Admit

**REQUEST FOR ADMISSION NO. 2:** Admit that you did not tell any other officer on May 29, 2020, that you had a brain tumor.

**ANSWER:** Admit

**REQUEST FOR ADMISSION NO. 3:** Admit that no one can see your brain tumor by looking at you.

**ANSWER:** Admit

**REQUEST FOR ADMISSION NO. 4:** Admit that your cell phone video of May 29, 2020, does not show you telling anyone you had a brain tumor.

times on May 29, 2020 to move away from the protestors, as your cell phone video shows.

**ANSWER: Admit**

**REQUEST FOR ADMISSION NO. 12:** Admit that other officers besides Deputy Cannon told you that you had to move away from protestors on May 29, 2020, as shown on your video.

**ANSWER: Admit**

**REQUEST FOR ADMISSION NO. 13:** Admit that Sgt. Ortiz told you to move away from protestors on May 29, 2020, as your cell phone video shows.

**ANSWER: Admit**

**REQUEST FOR ADMISSION NO. 14:** Admit that Sgt. Ortiz told you multiple times to move away from protestors on May 29, 2020.

**ANSWER: Admit**

**REQUEST FOR ADMISSION NO. 15:** Admit that you argued with Deputy Cannon about why you should not have to move away from protestors on May 29, 2020.

**ANSWER: Admit**

**REQUEST FOR ADMISSION NO. 16:** Admit that you argued with Sgt. Ortiz about why you should not have to move away from protestors on May 29, 2020.

**ANSWER: Admit**

**REQUEST FOR ADMISSION NO. 17:** Admit that you pulled away from Deputy Cannon as he tried to cuff you.

**ANSWER: Admit**

